

CHARLES AARON BROOKS / Charles Aaron Brooks  
P.O. Box 26020  
Beaumont, TX 77720

FILE 1-OF-12  
Original

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

CHARLES AARON BROOKS  
Pro-se Plaintiff

Civil Action No. ~~117CV351~~

- vs -  
CHARLES E. SAMUEL JR.  
MATTHEW PAIMPALIL BRIANTENNIS  
KRYSLA BROWN, SREEDHAR POLAVARAPU,  
SHANE SALEM, MARGARITA LAGUNA,  
DAVID YAGGER, LT. CHRISTOPHER JONES,  
TYSON OWEN, RENEE SIERRA, BRENNAN  
GALLENFINE, DENISE MAZE, JASON  
SICKLER, William HOLZAPFEL ("complex  
captain") FRANK LARA WAYNE HUNTER,  
BRETTANY CONDO, Mrs. Jones ("female guard")  
~~and 10 John Does &~~  
SIS OFFICERS - UNKNOWN all sued in their  
Official Capacity and Individual  
Capacity. Defendants.

Civil Action under  
28 U.S.C. 1331  
Plaintiff Request  
A Jury Trial  
Demand ☒ Yes.

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

AUG 25 2017

PLAINTIFF SWORN AFFIDAVIT  
& CIVIL ACTION 28 U.S.C. 1331

BY  
DEPUTY

THIS COURT HAS JURISDICTION &  
VENUE

And this is a Civil Action authorizing by the Federal Court, IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION. This Honorable Court have Subject matter Jurisdiction under 28 U.S.C. 1331, 28 U.S.C. 1346(b)(1), Americans with Disabilities Act, Architectural Barriers Act, Rehabilitation Act Statutes, 28 U.S.C. 2680(h), 28 U.S.C. 1345(a)(2). This Honorable Court should redress the deprivation under the color of Federal law, which did violate state of Texas Civil Rule, code, regulation & state Constitution. Defendants conduct are in conflict with state of Texas Laws, U.S. Constitution, Bill of Rights, which is in conflict with Bureau of Prisons Program Statements - Codes - Regulations - policy, which is in conflict Code of Federal regulation. Defendants did intentionally completely breached Contract 18 U.S. 4042 et seq (Revised in by public Law 105-314, 105-119 an 106-553) 18 USC 3621(c), ADA, Architectural Barriers Act, Rehabilitation Act, 18 USC 2243, BOP Policy Program statement #5324-06, 5324-11, 3713. 24, 3713.25, 3713.26, 5935.09, 1210.24, 28 C.F.R. 35.104.

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See: Ross - vs - UNITED STATES 641 F. Supp. 368 - 376 (D.D.C. 1986)  
See: Yusuf - vs - UNITED STATES, 642 F. Supp. 415 (M.D. Pa. 1986)

PLAINTIFF ADDRESS

B. CHARLES AARON BROOKS / Charles Aaron Brooks residence at  
P.O. BOX 26020 Beaumont, TX 77722, where he is incarcerated.

DEFENDANTS ADDRESSES

At All times relevant at issue;

C. Charles E. Samuel Jr, BOP Director, 320 First St. N.W Washington, DC 20534.

MATTHEW PAIMPALIL, Unit Manager, P.O. BOX 26030 Beaumont, TX 77720

BRIANT ENNIS, MEDICAL DOCTOR, P.O. BOX 26030 Beaumont, TX 77720

Krystile Brown, MENTAL DOCTOR, P.O. BOX 26030 Beaumont, TX 77720

SREEDHAR POLAVARAOJU, medical Doctor, P.O. BOX 26030 Beaumont, TX 77720

MARGARITA LAGUNA, mental Doctor, P.O. BOX 26020 Beaumont, TX 77720

DAVID Yeager, Lieutenant, P.O. BOX 26030 Beaumont, TX 77720

L.T. Christopher Jones, Lieutenant, P.O. BOX 26030 Beaumont, TX 77720

TYSON OWEN, guard, P.O. BOX 26030 Beaumont, TX 77720

René SIERRA, guard, P.O. BOX 26030, Beaumont, TX 77720

BRENNA GALLENTINE, guard P.O. BOX 26030 Beaumont, TX 77720

DENISE MAZE, UNIT MANAGER, P.O. BOX 26030 BEAUMONT, TX 77720

JASON STICKLER, Regional Director, P.O. BOX 26030 Beaumont, TX 77720

William Holzapfel ("complex captain"), BOX 26030 BEAUMONT, TX 77720

Frank LARA, WARDEN, BOX 26030 Beaumont, TX 77720

Wayne Hunter, Counselor, BOX 26030 Beaumont, TX 77720

BRETTANY Comb, guard, BOX 26030 Beaumont, TX 77720

MS. Jones, guard, BOX 26030 Beaumont, TX 77720

TEN John Does (prison OFFICIALS), is officer at 26030 Beaumont, TX 77720

Are sued in their OFFICIAL capacity and OFFICIAL Compacity.

DEFENDANTS ACTING UNDER COLOR OF FEDERAL LAW

D. The defendants Acting within the Course and Scope of there employment of there OFFICE at the time of the incident out of which the Claim arose. The defendants conduct were not Applied in a effort to maintain or restore discipline. Rather were used to cause malicious & sadistically cause harm and Permanent injuries. Including mental & emotion distress.

DEFENDANTS COMPLETELY BREACHED

CONTRACT ESSENTIAL ELEMENTS

E. Defendants completely breach of Contract as describe on pages 1 and 2. When defendants did Breached Contract with plaintiff did exist 1.) An Agree -

ment existed between plaintiff and defendant<sup>s</sup> and (2) the plaintiff substantially performed its obligation under the agreement and (3) defendant<sup>s</sup> breached the agreement, and (4) the plaintiff was damaged by the breach. see: *YOUSUF vs- United States*, 642 F-Supp. 415 (M.D. Pa 1986). Plaintiff do ment the pronges of ADA individual elements.

#### DESCRIBE CONTRACT BREACHED CODES

F. 18 U.S.C 3621 et seq, 18 U.S.C 4042 et seq (revised in by Public Law 105-314, 105-119 an 106-533), Bureau of Prison Program Statement 5324.06, 5324.11, ADA, Architectural Barriers Act, Rehabilitation Act, ~~14th AMEND~~ 8th, 14th AMEND ~~14th AMEND~~, Code of Federal Regulation, Texas State Constitution, Texas State Civil Rules, Federal Statutes and Federal Laws 18 U.S.C 2243, 18 USC 3621(c), denied challenge program, medical services, mental services, activities.

#### DEFENDANTS KNEW OR SHOULD HAVE KNOWN

G. that it Failed to stop these ~~UNCONSTITUTIONAL~~ PRACTICES, directly participated in these (unconstitutional) practices and Created or help Create the policy, Customs or Practices Defendants Failed to trained subordinates and allowed subordinate to cause injuries to plaintiff. That completely breach Contracts designed to protect the plaintiff State & Federal rights inter alia. Deprivation ~~OF RIGHTS~~ OF RIGHTS were not afforded to the plaintiff defendants intentionally. Failed to protect the ~~PLAINTIFF~~ Plaintiff. Defendants failed to charge the policy they knew or should have known were unconstitutional, [Prison Rape Elimination Act], 18 U.S.C 2243. DEFENDANTS ADMITTED "SO WHAT WE ARE DOING TO YOU IS ILLEGAL YOU DESIRE IT IF YOU WERE NOT A NIGGER FAGGOT muslim disable we would not Hate you to try IN Kill You boy". Each defendants said.

H. The Civil Complaint in relevant parts "IF the Court determines however, that the defendants action constituted "a civil violation or breach of Contract, and deliberate indifference, Actual

Malice, or willful misconduct, the defendants may not invoke the protection of official immunity. Defendants intentionally place the plaintiff in a unsafe environment violated or completely breached contract. The abuse of process and misrepresentation A Actual Negligence Acts. 28 USC 1346(b)(1) & 28 USC 2680(h). ~~deliberate indifference~~ Equal protection.

I. Plaintiff Facts beginning on December 28, 2016 ON approximately Charles E. Samuel Jr, Jason A. Sickler, Dr. Polavarapu, Mr. Halzapper, Mr. Byrd, learned that

- 1.) plaintiff medical records Orthopedic Doctor report order immediate knee replacement surgery on both knees the defendants knew or should or know plaintiff a
- 2.) care level three (data) sheet and plaintiff should be in house at Medical Facility. The above defendant falsified care level ~~two~~ data sheet. As if to keep plaintiff
- 3.) in a non-handicapp disable Federal prison. A unsafe environment the defendants denied plaintiff services Activities, programs to challenge program discrimination (non-handicapp Accessible prison).
- 4.) do to the plaintiff were handicapp disable, muslim, African American and plaintiff sexual orientation. Defendants denied plaintiff a wheel chair, walker
- 5.) denied knee braces, back brace, therapy, surgery, denied lower bunk pass order and lower tier unit order. The plaintiff reported he fell to the ground over
- 6.) 7 time sustain injuries to my back, neck, head, knees between approximately 12/28/2016 throughout April 20, 2017 the plaintiff informed above defendants verbally with
- 7.) A copy of medical record that its unsafe for him to walk up stair to BB-unit and force to take top bunk bed to sleep cause serious injuries and pains to
- 8.) back, neck, head, knees, Feet burnion. Denied plaintiff medical service, X-Rays, MRI scans, cat scans on injuries from 12/28/2017 - August 15, 2017 he fell.
- 9.) Defendants above named completely breached contract Bureau of Prisons Program Statement 1210.24, by lying, falsify information on government.

- 10.) document Care Level 2 data Sheets: When defend-  
ants KNEW that plaintiff were in fact A Care Level  
three patient. Failure to transfer plaintiff to
- 11.) medical prison Facility to have surgery on knees  
~~Interfered~~ with medical treatment once  
prescribed. were cruel & unusual punishment
- 12.) For Failure to services to surgery for Approximate-  
ly three year malicious & sadical permanent:  
disabilities. The plaintiff were treated disfavorable
- 13.) to similar situated christian prisoner handicapp  
disable Leon Thomas, Donna Musgrove, Harold  
Barnes, Crawford Hill, Joh Quitti, Williams,  
Fred Jones breached Equal Protection
- 14.) ON Approximately ~~April~~ 21, 2017 Ms. Como, MS Jones  
Can be seen committing larceny by destroying the  
plaintiff legal book, Civil Complaints, Criminal
- 15.) brief, Newly discovered evidence, personal  
property over 76 sworn Affidavits signed  
under penalty of perjury 28 USC 1746, 18 USC 1621  
by 76 inmates:
- 16.) that were prima facie proof that defendants  
at clc.s.P Canaan Penitentiary, Beaumont Pen-  
itentiary violated 1st, 8th, 5th, 14th Amend Rights  
of plaintiff & other inmates Right.
- 17.) ON Approximately 4/21/2017  
The surveillance video tape prima facie proof  
Ms. Como enter cell 420, on BB-unit 4 green  
cliffle bags she confiscate and took to
- 18.) Guard booth office on BB-unit (guard) station  
the video came show defendant Como and MS.  
Jones add trash plaintiff grievances / Legal
- 19.) books, stamps, legal documents to obstruct  
Justice deny plaintiff access to the court,  
Larceny personal property,

6-0F-12

20) to Commit Fraud & Concealment to Commit Larceny so the plaintiff cant redress of grievance. Denied Access to the Court.

21) On Approximately ~~XXXX~~ 1/22/2017 MR. Yeager, MR. Owens, MR. Sterrie, did enter cell of plaintiff while on special housing Unit these defendants

22) did Commit battery, sexual assaulted plaintiff punch in Face, penis, head, Kicked, spit on, death threats "we Kill & hate Muslim Faggot dis-

~~abled~~ <sup>CAB.</sup> ~~XXXX~~

23) Able Nigger we will lynch you. Fuck you up the Ass "grabbing the plaintiff buttock they laugh at touching buttock calling plaintiff

24) "A good pussy Faggot ~~we~~ plan to Fuck you. terrorist threats they would kill me if they find out I told on them. said Yeager, owns."

25) Brutally beaten until unconsciousness when I awake my pants and Underwears down to my knees. A pool of blood unable

26) to stand up or walk urinating / coughing up blood pains in back, neck, knees, head, shoulder, Feet burn, Ankle heel, Ankle pain, Nerve

27) damage on Approximately 1/22/2017 - 1/23/17 Ms. Gallentine ~~have~~ refuse to call medical ~~EMERGENCY~~ claim "plaintiff need to be Killed"

28) "you Fuck with ONE of us you Fuck with all of us nigger your A Faggot muslim that need to be Lytch we hate disable inmates"

29) "you better stand up or they will come back again and beat you more your A Faggot now that what you get they told me what"

7-0F-13  
30) "they did to you Faggot. IF you were not A nigger mustim this would not happen to you." I will never call medical for you" said Gallentine.

31) ON approximately 1/23/2017 plaintiff yelled to MR. Jones help me sir, they beat me for nothing I did nothing wrong. Who did ~~that~~?

32) Four white male Correctional Officer Yeager, Mr. Owens, serrrie another name, UnKnown I told "MR. Jones. MR. Jones said "Brooks I

33) "cant snitch my coworker out. I knew them before I knew you, I know there wives & family I know they sexually assaulted you & battery to teach you a lesson for ordering a guard stabbed." said Jones

34) "You a Nuisance at this prison we dont want you here. You the one that order guard. Stab at Hazelton Penitentiary Complex Captain told us. said MR. Jones.

35) "HE WANTS to teach you a Lesson. So I'm going to call MR. Byrd and tell him nothing about the sexual assault nor battery. You shut

36) "your month I will roll your ass you dime ME OUT my Friends / coworkers Even if you cant. walk I will drag you back in your cell not

37) "take you to the outside hospital." MR. Jones without a camera handcuff prisoner From Food Shop in the Front. Open cell door enter

38) cell with a wheel chair violently punched, grab plaintiff buttock your A Faggot now he laughed punch plaintiff. Grab penis stick fingers up ANUS I'm looking for a knife

34) "squeeze testicle your our bitch as MR. Gallentine with weapon in hand said "he cried like a bitch all night calling for medical"

35) MR. Jones defamaton of Character, death threats violently place on wheel chair

OF Prisons Program Statement, Code of Federal  
Regulation which is in violation of UNITED STATES  
CONSTITUTION.



8-0.F-13

- 36) Jones sexual assaulted plaintiff, unnecessary, excessive force in bad faith...
- ON approximately 1/23/2017 MR. Byrd medical
- 37) STAFF refuse to report sexual assault or battery Jones said
- 38) MR. Byrd he can't walk nor stand if you take plaintiff to outside hospital it will be a injury report file against Yeager, Jones etc
- 39) So MR. Jones said "I will drag this animal on his KNEES back to his cell he ordered A guard to be stabbed at another jail" said Jones.
- 40) MR. Byrd said "I will not report it no medical Assessment okay. Plaintiff were drag on his knees back to his cell. Plaintiff told them he would contact OIG, IAD, Jones said Shut up bitch"
- 41) ~~ON~~ ON approximately 1/29/2017 MR. Yeager came to the plaintiff cell in SHU Unit with death threats and terrorist threats if plaintiff contract
- 42) OIG he would lynch a nigger he hate disable muslim niggers that why we tryed to kill you he said. Yeager.
- 43) With ~~intimidation~~ intimidation MR. Yeager said "Just handcuff come to my Lieutenant Office I want to talk to you."
- 44) Plaintiff Followed his Command walked into Lieutenant Office in SHU Unit and MR. Yeager began to punch, strike, kick, while in handcuffed behind my back.
- 45) and then other guards names unknown ran in violently held plaintiff pulled down ~~my~~ pants and underwear. Rape plaintiff repeatedly different 4 or 5 guards.
- 46) Prison Staff name Unknown place penis in the plaintiff anus still plaintiff

9-0F-13

- 47) Feared for his life Defendants called him homo-sexuals, Faggots, bitches. while different
- 48) penis of Correctional Officer were assert in ANUS. We will make you Kill yourself Nigger muslim. Retard we Kill all muslim my
- 49) "white brothers lynch your race for years and we never get prosecuted you want to call OJG, IAD. well we are going to trash"
- 50) "all your personal property all that remain All you Stamps, Paper, legal documents, telephone BOOKS, Address, Court Address"
- 51) "23 yrs of all you accumulated in jail will be destroyed you never get a call, we will, take your E-mail, phone. No outside contact"
- 52) "No One CARES if we rape you." Unit team Ms. maze, Mr. Paimpalil, Mr. S. Salem, Ms Halzelpher, Dr. Turner, Chapline, MR. HUNTER, DR. K.
- 53) Brown is my girlfriend and these BOP Employees including Jones they will not snitch me out, they will concealment of what we doing
- 54) "to you, On approximately 4/16/2017 Filed a incident Report # 2976122 Mr. Yeager informed his girl, to File A misbehavior
- 55) False incident report 2976122 and ~~2009748~~ 3009748 were Filed to prevent plaintiff From transferring From Beaumont Prison
- 56) the defendants deprive plaintiff medical treatment his ANUS bleeding, Abdominal stomach pains degraded, humiliated, mental &
- 57) emotional distress the plaintiff Feared

58) For his life. On approximately on these dates AFTER Sexual Assault, Repeated Rape, Assault, Battery made in bad Faith.

59) Defendants deprive plaintiff in SHU Unit a psychological evaluation every 30 days the plaintiff cut his left wrist with

60) A razor in a up & down cutting angle 4 severe cuts because MR. Yeager girlfriend DR. K. Brown refuse to order plaintiff

61) to be place on suicide watch do to the plaintiff ~~Religion~~ Race, ethnicity, sexual orientation and disabilities. (DR. Lugunina)

62) Dr. Polavarapu, MR. Byrd, all defendant's knew or should be known plaintiff would suffer serious injuries at a non-handicapp disable jail not handicapp accessible.

63) Plaintiff filled out "medical slips" (sick call slips) At both Beaumont Penitentiary and FCC Complex Low given BOP employee Judicial Not-

64) ECE that plaintiff fell in non-handicapp accessible disability showers, cell, Jail on over 9 different dates. Denied plaintiff medical treatment.

65) Even after plaintiff Filed [PREA] Against MR. Jones inter Alia on approximately [7/7/2016] ~~Stalk~~ [plaintiff] he came with medical staff

66) to ASK plaintiff to reveal his penis & buttock to see IF plaintiff have cuts on private parts (genitals). DR. Lugunina, DR. K. Brown deprive sexual Assault counseling.

67) Failure to protect plaintiff on approximately 8/11/2017 MR. Sierrre another prison officials

- 68) in SHU Unit 136 cell on Range 200 Committed Larceny again destroying 24 Sworn Affidavits DNA (sperm) evidence that prove identity of rape defendants.
- 69) OF plaintiff OF other inmates prisoner sexually Assaulted, Rape, battery occurred by these same (correctional officers) Mr. Sierra and other guards destroyed plaintiff prima facie proof legal documents ~~on a paper~~
- 70) 24 Sworn Affidavits of inmates filed against defendants were signed under 18 USC 1621, 18 USC 1746 these inmate filed grievances, complaints against defendants which would
- 71) OF showed a pattern breaching contract of the Civil Rights Act. These Mr. Sierra and SHU Unit guards destroyed 9 books of
- 72) mailing stamps, legal books, self help guide books, civil complaints, criminal documents, dead relative pictures, destroyed grievances, civil complaints.
- 73) OIG complaints, IAD complaints, letters, family pictures, the defendants destroyed favorable prima facie evidence of plaintiff
- 74) to conceal there wrong doings from the public Executive branch, Judicial branch
- 75) Defendants failure to hire a Counselor on BB-Unit team there for defendants denied indigent stamps, paper, pens, pencils legal copies, illegally confiscation of legal documents
- 76) Envelops, no one to serve plaintiff copies of his BP-10, BP-11, BP-9's Administrative Remedies. The Administrative Remedies were ~~NO AVAILABLE~~ plaintiff, Mail tampering, Larceny.
- that lives below the poverty guidelines, the
- 77) Failure to supply pens, paper, envelops, stamps, legal duplicates, denied Access to legal books,

- 78) Defendants denied Forensic Medical Examination on DNA evidence that would identify Mr. Yeager and other guard that repeatedly rape plaintiff.
- 79) Defendants denied medical treatment services, programs, activities for back pains, neck, knee's pain, hip, neck, head pain, shoulder pain, anus pain, abdominal pains, feet pain, therapy, MRI scans, x-rays, cat scans, wrist pain, proper pain relief handicapp accessible tail.
- 80) denied Law library, denied legal aid, denied sexual assault counseling, denied legal call to attorney, denied legal copies, stamps, paper, pens, pens, care Level 3 data sheet, wheel chair, walker.
- 81) denied right to exhaust Administrative Remedies were not available to plaintiff at either prisons because BB-unit had no counselor at all times relevant.
- 82) MR. Hunter, Pampalil, all defendants said "MR. Holzapfel told us while you were a inmate at Hazelton prisoner while he was captain you were a ~~member~~ of BGF and you order Talley (a inmate) to stab a guard there." So we will never report our staff kicked your ass nigger you deserve it to get fucked up the ass MR. Hunter said "I will not report you got rape, nor process your ~~grievance~~ grievance defendants said Hunter
- so what, we do illegal things to teach you a lesson boy, said all defendants we don't snitch on our own boy. said defendants.
- 84.) DR. K. Brown, Holzapfel, Gallentine, Frank Lara, Brant Ennis, Shane Salem, Polawara PUS said "All staff at Beaumont Texas prison know you was sexually assaulted, battery, repeatedly rape
- 85) we had meeting about it. we know you help Demetrius Hill vs Haynes Civil Action West Virginia U.S. Dist Court MR. Holzapfel order L.T. Moseley & guard to beat your ass you cried like a girl. said Jones, Defendants taunt
- 86) Charles E. Samuel Jr, Jason Sickler, Salem, Holzapfel knew or should of known through grievances that defendants were
- 87) violating constitution, defendants failure to train subordinate created the policy, customs that completely breach contract. Defendants directly participate in the unconstitutional
- 88) practice, which are in conflict with BOP Policy, CFR. Defendants failed to stop these unconstitutional practice from continuing and failure to protect plaintiff
- 89) Defendants each knew or should of known that plaintiff gave each judicial notice, verbal notice, ~~implied~~ implied notice on government ~~that defendants were~~ documents that plaintiff
- 80) were repeatedly rape, sexual assaulted, battery, defamation of character, sexually harassed defendants did not stop felony crimes that violated 1st, 5th, 8th, 14th Amend Const.

VIOLATING CONSTITUTION

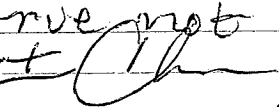
I. The defendants violated BOP Policy 1210.24, Texas Law markers passed Senate Bill 1611, Citizen Protection Act, Texas state Law, state constitution (ADA), Architectural barriers Act,

78) denied access to

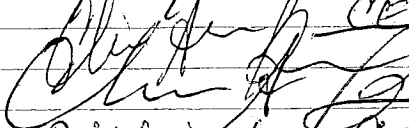
Rehabilitation Act, 8th, 14th Amendment of U.S. 13-07-13  
Constitution, Bill of Rights, state court rules. denied 1st,  
5th Amend Right, equal protection, liberty interest

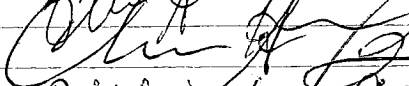
\* WHEREFORE, the plaintiff demands:

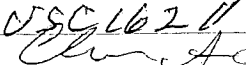
Judgment on his claim for compensatory  
damages for each defendant One million dollars,  
Judgment on his claim for punitive damages  
for each defendant 50 thousand dollars,  
and judgment for his claim for Nominal  
damage One dollars for each defendant.  
Defendants pay all Court cost, Taxes; Court  
Fines, BOP Fines owe by plaintiff. Plaintiff  
shall be house at Medical Facilities Butner  
etc to receive surgery on knee's (Knee  
replacement surgery on both knee's), therapy,  
at Care Level three data sheet (handicapp  
disable Accessible Federal Prison) the plaintiff  
Low back, Neck, Feet bunion surgery  
must be remove, Adequate medication  
& medical treatment, mental health service,  
activities, programs must be Afforded  
to plaintiff. The defendant shall sign Contract Not to  
continued plaintiff in a penitentiary for duration of confinement  
he will receive handicapp disable Accessible cell and receive single cell  
statutes.

I Charles Aaron Brooks / CHARLES AARON  
BROOKS duly states that the foregoing is  
true & correct to the best of my know-  
ledge information and belief. Plaintiff  
state a claim that relief can be grant-  
ed. Complaint is true not frivolous nor  
maliciously made. 

18 U.S.C. 1621, 28 U.S.C. 1746, 18 U.S.C. 1001 et  
seq 8/20/2017

 CERTIFICATE OF SERVICE

I  sent original to U.S.  
District Court at  
this to Complaint to defendant. And a copy of

28 USC 1746 on approximately.  
18 USC 1001 et seq, 18 USC 1621 8/20/17  


Charles Aaron Brooks  
44230-066  
U.S. Prison  
P.O. Box 26020  
Beaumont, TX  
77720

CERTIFICATE OF SERVICE

I CHARLES AARON BROOKS / Ch AD

Mail this Thirteen page (13 page) Civil  
Complaint to the Honorable Court  
in U.S. District Court for the  
EASTERN DISTRICT OF TEXAS

Beaumont Division 350 Magnolia

Suite 150, Beaumont, TX and 14 Pages  
of Plaintiff ~~Exhibits~~ in Civil Action No. ~~1:17CV351~~

1:17CV351 (USDC-EDTX Beaumont)

The plaintiff has Mailed normal  
mail ~~copy~~ <sup>original</sup> of Civil Complaint  
and Attached Amend Motion  
to the Deputy Clerk of  
Court. and Copy Mail to

A U.S.A. ANDREA L. PARKER

SENT NORMAL MAIL.

I Ch AD declare on  
date 8/20/17 28 U.S.C 1746, 18 U.S.C  
18 USC 1621



# Exhibit

11 11  
A

SWORN & DECLARATION

11 11  
EXHIBIT A

Name defendants did receive A  
COPIES of documents Attached

I Ch declare the Original  
EXHIBIT herein were given to  
defendants name in Court Action

1:17 CV-351 each receive copies  
OF documents between 12/28-17  
throughout 8/21/2017 Ch I declare  
under penalty of perjury 18 U.S.C. 1621, 28 USC  
1746 Ch 8/20/17

*COPY sent*

**ALL VISITS ARE SUBJECT TO \$2.00 SICK CALL FEE**

Todas las visitas son sujetos a una tarifa de llamada de \$2.00 enfermo

*SWORN DECLARATION*

**SICK CALL FORM**

**PLEASE READ CAREFULLY**

Sick Call hours are Monday, Tuesday, Thursday and Friday during 6 to 7 am  
Wednesday is designated for SHU appointments.

*pain level 10 cant stand*

Date/Fecha: 1/24/2017 Reg No./Numero: 49230066 Housing Unit/Unidad de ivenda: SHU

Name/Nombre: Charles BROOKS Reg. #/Numero 49230066 Age/Edad: 52 yrs

SICK CALL Reason/Motiva consulta medico: I was Brutally beaten & sexually

Assaulted by MR. Yeager, MR. Owens, MR. SiERRIES another guards  
my back, neck, knee, feet, head hurts pains 1/22/17,

How long have you had this problem/Cuando tiempo ha tenido este problema?  
1/22/17 Days/Dias 1/22/17 Months/Meses \_\_\_\_\_ Years/Años

Are you currently taking over the counter medications/Esta tomando actualmente medicamentos de venta libre?

☒ Yes ☐ No

The Meds dont work at all

✓ **REFILLS and RENEWALS** of medication may be submitted on a Refill Request form.

Repuestos y renovaciones de medicamentos pueden ser presentadas en un formulario de Solicitud de Recambio.

✓ **PASSES** will only be renewed until next CC visit and **ONLY** if you meet criteria.

Las tarjetas solo se renovaran hasta el proximo visita CC y solo si cumple con los criterios.

✓ **RESULTS** of lab tests and xrays will **NOT** be discussed at sick call. You can submit a copout for results.

Resultados de las pruebas de laboratorio y radiografias no se discutir a en la llamada enferma. Usted puede enviar un copout para los resultados.

**STOP**

**STOP! DO NOT WRITE BELOW**

**STOP**

Time: \_\_\_\_\_

Pain: 0 1 2 3 4 5 6 7 8 9 10

Location: \_\_\_\_\_

Vitals: Temp: \_\_\_\_\_ Pulse: \_\_\_\_\_ Resp: \_\_\_\_\_ BP: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_ O2%: \_\_\_\_\_

Notes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

ALLERGIES: \_\_\_\_\_ CC Dx: \_\_\_\_\_

ORDERS: \_\_\_\_\_ -POX

SWORN Declaration of Truth of CHARLE ARON BROOKS  
Dr. Pee (AKA) should transfer Prisoner to Medical Facility.

**ALL VISITS ARE SUBJECT TO \$2.00 SICK CALL FEE**

Todas las visitas son sujetos a una tarifa de llamada de \$2.00 enfermo

**SICK CALL FORM**

**PLEASE READ CAREFULLY**

Sick Call hours are Monday, Tuesday, Thursday and Friday during 6 to 7 am  
Wednesday is designated for SHU appointments.

SWORN Declaration  
of Truth of  
Prison Charles  
Brooks below  
18 USC 1621, 28 USC 1746

Date/Fecha: 12/18/2016 Reg No./Numero: 49230066 Housing Unit/Unidad de vivienda: BB-Unit

Name/Nombre: CHARLES BROOKS Reg. #/Numero: 49230066 Age/Edad: 52 yrs old

SICK CALL Reason/Motiva consulta medico: I'm a Care Level 3 prison need need knee replacement surgery on both knees I Fall down need to be transfer to handicapp disable accessible jail, need A Wheel Chair walker, knees braces - back brace, Neck brace, soft shoe  
How long have you had this problem/Cuando tiempo ha tenido este problema?  
☒ Days/Dias ☒ Months/Meses ☒ Years/Años

Are you currently taking over the counter medications/Esta tomando actualmente medicamentos de venta libre?  
☒ Yes ☐ No need better adequate medication, therapy,

max scan on neck, hip, back, surgery on feet Joints, cat scan on head.

- ✓ **REFILLS and RENEWALS** of medication may be submitted on a Refill Request form.  
Repuestos y renovaciones de medicamentos pueden ser presentadas en un formulario de Solicitud de Recambio.
- ✓ **PASSES** will only be renewed until next CC visit and **ONLY** if you meet criteria.  
Las tarjetas solo se renovaran hasta el proximo visita CC y solo si cumple con los criterios.
- ✓ **RESULTS** of lab tests and xrays will **NOT** be discussed at sick call. You can submit a copout for results.  
Resultados de las pruebas de laboratorio y radiografias no se discutir a en la llamada enferma. Usted puede enviar un copout para los resultados.



**STOP! DO NOT WRITE BELOW**



Time: \_\_\_\_\_ Pain: 0 1 2 3 4 5 6 7 8 9 10 Location: \_\_\_\_\_

Vitals: Temp: \_\_\_\_\_ Pulse: \_\_\_\_\_ Resp: \_\_\_\_\_ BP: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_ O2%: \_\_\_\_\_

Notes: \_\_\_\_\_

ALLERGIES: \_\_\_\_\_ CC Dx: \_\_\_\_\_

ORDERS: \_\_\_\_\_ -POX

The medical staff & medical staff at  
Beaumont Prisons are violating ADA, 42 USC 4152-4157,  
Rehabilitation Act Violating Contract 18 USC 3621(c),  
18 USC 4042 (revised in by public Law 105-314 105-119 an 106 -  
553 Clin A 28 USC 1746 12/18/16 *approx. mailed*

copy given to medical

(3)

**ALL VISITS ARE SUBJECT TO \$2.00 SICK CALL FEE**

Todas las visitas son sujetos a una tarifa de llamada de \$2.00 enfermo

**SICK CALL FORM**

**PLEASE READ CAREFULLY**

Sick Call hours are Monday, Tuesday, Thursday and Friday during 6 to 7 am.  
Wednesday is designated for SHU appointments.

Date/Fecha: 1/29/17 Reg No./Numero: 49230066 Housing Unit/Unidad de vivienda: SHU Unit at Penitentiary

Name/Nombre: C.A. Brooks Reg. #/Numero: 49230066 Age/Edad: 52 YRS old

SICK CALL Reason/Motiva consulta medico: Four white males enter my cell for no reason beat me up slammed my head to ground kicked, stomp, head trauma, sexual Assaulted me grab my penis, buttock tail me faggot, homosexual brutal beat me until I was unconscious

How long have you had this problem/Cuando tiempo ha tenido este problema? Neck, Feet, Anus, Penis, Knees, hip

Days/Dias 1 Months/Meses 1 Years/Años 1

Are you currently taking over the counter medications/Esta tomando actualmente medicamentos de venta libre? Shoulder  
Yes No medication dont work Need wheel chair, walk-ER, therapy, X-RAY, MRI

- ✓ **REFILLS and RENEWALS** of medication may be submitted on a Refill Request form. Scan, Cat scan, Knee brace, Neck brace  
Repuestos y renovaciones de medicamentos pueden ser presentadas en un formulario de Solicitud de Recambio.
- ✓ **PASSES** will only be renewed until next CC visit and **ONLY** if you meet criteria.  
Las tarjetas solo se renovaran hasta el proximo visita CC y solo si cumple con los criterios.
- ✓ **RESULTS** of lab tests and xrays will **NOT** be discussed at sick call. You can submit a copout for results.  
Resultados de las pruebas de laboratorio y radiografias no se discutir a en la llamada enferma. Usted puede enviar un copout para los resultados.



**STOP! DO NOT WRITE BELOW**



Time: \_\_\_\_\_ Pain: 0 1 2 3 4 5 6 7 8 9 10 Location: \_\_\_\_\_

Vitals: Temp: \_\_\_\_\_ Pulse: \_\_\_\_\_ Resp: \_\_\_\_\_ BP: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_ O2%: \_\_\_\_\_

Notes: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

ALLERGIES: \_\_\_\_\_ CC Dx: \_\_\_\_\_

ORDERS: \_\_\_\_\_ -POX

Charles Aaron Brooks  
49230-066  
P.O. Box 26020  
Beaumont, TX  
[77720]

COPY SENT  
Defendants (4)  
SWORN Declaration  
OF CHARLES BROOKS  
Ch ~~A~~ 18 USC 1621,  
28 USC 1746, 18 USC  
1001 et seq 1/1/17

Dear Mr. Holzapfel or Holzapfel  
Dear Charles E. Samuels, Jason Sickler  
Please Stop telling STAFF White Male OFFICERS  
that I ordered A BGF member Name Talley  
at Hazelton Prison to stab A guard 15 times.  
YOUR White Male OFFICERS MR. Yeager, Owens,  
MR. Soerrie, MR. Pampalil, S. Salem, Jones,  
MR. Byrd, DR. BROWN, ERICUS deprive me  
challenge program, and other programs  
do to my disabilities. They deny me Medical  
services, DR. BROWN said "since I had the  
guard stab she will never give me A psycholo-  
gical evaluation she & ERICUS said they  
dont trust me. I was not indicted nor  
involved with the stabbing at Hazelton Prison.  
When you was Captain. You got White male at  
Beaumont Prison threatened me with death  
threats. Just because I testified in Federal  
Court against Mr. Haynes (warden) in Civil Action  
Demetrius Hill - vs - Haynes (west Virginia) you  
beat me so bad Sir, got MR. Mosely to be me and  
4 White OFFICER White handcuff. I did not  
File no lawsuit, you beat for filing grievance. Please  
Sir Holzapfel the Beaumont Prison STAFF is spread-  
ing the rumor I got A White Correctional stab  
and I'm a leader of the BGF. I'm AFRICAN  
American Inmate trying to Change you should put  
me in protective custody the STAFF call me  
Homosexuals, Faggot, Rat, Snitches in front of prison  
OFFICIALS, and prisoner I receive sexual proposals  
death threats, I Fear for my life Sir, you yelled in  
the kitchen on 1/1/2017 approximately I was there  
had you officer stab EVERYBODY heard you 1/1/2017  
Ch ~~A~~ 18 USC 1621, 28 USC 1746, 18 USC  
1001 et seq 5/15/17

See: Exhibit Attached "Trust fund document" 2-05-2  
He did not see that plaintiff receive proper adequate medical care (surgery shall be given), Award plaintiff money, Medical Facilities should be transferred there immediately into Alia.

(17) Defendants denied plaintiff ADA, 42 USC 4151-4157, Rehabilitation Act, sexual Assault, Battery, Retaliation, Campaign harassment, use of unnecessary Excessive Force, emotion & mental distress, sexual Harassment, complete breach of contract relation into Alia.

(18) Plaintiff age 52 yrs old,

(19) African American

(20) Male

(21) October 20, 1964

(22) Driver license (N/A)

(23) 178-56-7492

(24) 4628 Westminister Ave Phila, Pa ~~the~~ address at time of plaintiff/petitioner Arrest on approximately 9/1/1995

(25) At time of petition Arrest plaintiff Charges Armed bank robbery.

(26) Arrested 9/11/95

(27) Arrested in Philadelphia Pennsylvania / County of Philadelphia.

(28) State of Pennsylvania Police Officer & FBI Agent did Arrest plaintiff.

(29) Complaint 95-894-M / dated 9/6/1995 and Criminal Case No # 95-CR 364-01.

(30) Plaintiff pro-se petitioner paupers Oath the petitioner 6 months worth of Inmate trust Fund the pro-se plaintiff with inability to pay cost - individual Criminal Code of procedure Rule 502.3 Fees inability to pay. The following is true & correct under 28 USC 1746, 18 USC 1001 et seq, 18 USC 1621, Texas State Law, Rule 502.02 Ch 9/12/27/17

TO: MEDICAL DEPT  
INMATE REQUEST TO STAFF  
CHARLES BROOKS SWORN  
DECLARATION

⑤ C Brooks  
49230066  
P.O. BOX  
26030  
Beaumont, TX  
77720

COPY GIVEN TO STAFF

It appears each individual's attempt to exploit and expose your weakness to the public. Despite if you have small grains of flaws in your personality and a greater goodness. To crumble upon the prisoner were repeatedly Rape by MR. Yeager and his white male friends (coworker) on approximately 1/29/2017 in Lieutenant Office. They yell I'm a Faggot, homosexual, a women around inmates. Now the inmates make sexual proposal to me. The guards that sexual assault me and beat me stalks me each time they see me on General Population/STU Unit they said "its Brooks we all Fucked that nigger Faggot and he did not fight back, we beat him. We don't care if its not legal he deserve it" said MR. Sierrrie. After date of incident on approximately 1/22/17 MR. Owens, MR. Yeager, MR. Jones, 1/23/17 Mr. Gallington, Captain, Complex Captain I informed them MR. Byrd I have sperm of the predators that repeatedly Rape me I MR. Byrd IF he would do Forensic Medical Examination on DNA Evidence I had cloth bearing guards sperm that were on my underwear. I cut out the portion put in a plastic bag. The medical staff refuse to accept it. 2/3/2017 approximately 28 USC 1746. Ph d B

# SWORN DECLARATIONS

Charles A. Brooks 49230-066  
P.O. BOX 26020  
Beaumont, TX 77720

Copy sent

SWORN (6)  
Declaration  
28 USC 1746, 18 USC  
1621 *Ch A B*  
8/20/2017

I *Ch A B* declare in STD Unit 1/23/17  
unable to stand up or wash myself laying in  
FOUL AFTER OFFICER battery, Sexually Assaulted  
me. DR. POLAVARAPU Admitted plaintiff should  
OF been transferred to Care level 3 prison  
(medical prison) instead OF Beaumont  
penitentiary Forcing inmate / plaintiff  
to sleep on floor in his feces. Deprive him  
A wheel chair MR. Jones, MR. Brooks threw him  
OUT OF wheel chair so violently ON 1/23/17  
Knowing plaintiff need it to be mobile. Use  
OF unnecessary Excess Force in bad-faith was  
Applied grabbing force dragging inmate on his knees  
back to cell MR. Byrd, MR. Jones, MS. Galletta  
tine, violate 8th, 14th amendment plaintiff  
suffer knee pains, back pains, wrist pain, neck-  
feet pain, MR. Jones can be seen on surveillance  
video tape etc on 1/22/2017, 1/23/17 and  
1/29/2017 the plaintiff health deteriorated  
define Plaintiff do fit the essential Elements  
OF ADA, member or individual DR. POLAVARAPU  
Admitted plaintiff be immediately transferr  
to A Medical Facilities and he put the  
Order in for the transferr. Defendants Jason  
Sickler, defendants knew deliberate indifference  
would occure the unsafe environment with  
malice the malicious & sadistical punishment  
cause permanent damage from approximately  
Dec 28, 2016 through to August 20, 2017 denied  
services, Programs, Activities to plaintiff because  
he was handicapp disable when plaintiff entitled  
to equal protect under ADA, Rehabilitation Act,  
Architectural barriers Act Forcing plaintiff to  
Fly on NON-handicapp disable plane, denied MRI Scans,  
Cat Scans, X-Ray After Hell Fell pains in head, back,  
Knees, Neck, Etc violate 1st, 8th, 14th Amend Const  
*Ch A B* 18 USC 1621, 28 USC 1746 8/20/17



CHARLES Aaron BROOKS  
# 49230-066  
P.O. Box 26030  
Beaumont TX

C.C. FILE (7)

copy  
sent

2/20/17

copy  
made  
captain  
&  
unit team

37720  
SWORN Declaration  
18 USC 1621, 18 USC 1746,  
18 USC 1008 ~~17~~ 2/20/17

SWORN Declaration

Dear Captain of Beaumont Prison

MR. S. Salem I was present when Complex Captain told you another OFFICER I order Talley to stab a Correctional OFFICERS. He told you & six other OFFICERS on the Kitchen at Mainline. Sir I'm Not involved in such Action at all. Now you Ordered Mr. Yeager and other STAFF like Mrs. Combo, Mrs. Jone, Male OFFICER to stalk me, you denied for me to receive a Low bunk bed, denied me handicapp disable Accessible Cell, Shower, jail, and a lower tierer Unit, you told mail STAFF never to give me a walking cane, walker, wheel chair, Knee braces, back braces, soft shoe pass, denied therapy, MRI scans, cat scans, X-RAYS do to pains in head, back, knees, shoulder, hip, neck, bunions in feet, your refuse me surgery interfering with medical orders prescribe I'm in pain he ordered me surgery 2 years ago please it to my team Unit, All medical STAFF, mental STAFF guards to keep falling Sir. I Ch A D

18 USC 1621, 18 USC 1746  
2/20/17

C: Brooks 49230066 P.O. Box 26020 Beaumont, TX 77728

SWORN VERIFICATION

(8)

OF CHARLES BROOKS

duly states

COPY  
8/20/17

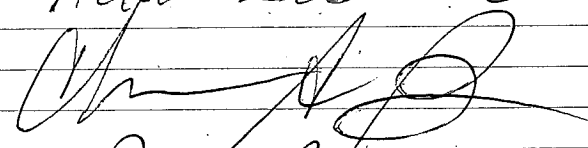
I CHARLES AARON BROOKS on approximately December 28, 2017 approached Medical Doctor, Medical Supervisor and defendants either in verbal conversation, written letters, complaints, grievances concerning Medical Services of surgery concerning Knee replacement surgery on both Knees, do to the constant pain in bunion Feet bunion removal surgery the Medical Doctor. I would be Classified as A Care Level three data sheet patient transfer to medical facility in One month. Instead defendants told Doctor Polavarapu, DR. K. BROWN, DR. LUGUNA, MR. Byrd, to falsify Mental Care level 2 data sheets & falsify Medical Care Level 2 data sheets in violation to BOP Program statement No 1210.24 Fabricate lies on government document knowing such violated 18 USC 641, 18 USC 1519 et seq 18 USC 1915 et seq, 18 USC 1001 et seq, MR. Holzappel, S. Salem, ENNIS told All defendants to lie. To be cruel & unusual punishment to Charles Brooks in bad faith to cause malicious & sadistical permanent disabilities by placing prisoner in A unsafe environment. MR. Jason Sickler & BOP Directors failed to prisoner health & safety 18 USC 1621, 18 USC 1002 et seq. Ce A 8/20/17

Sworn Declaration

CERTIFICATE OF SERVICE

under 28 USC 1746

CHARLES ARRON BROOKS duly states;

Original DEPOSITED to Jefferson  
County Courthouse 1149 Pearl Street  
Beaumont, Tx 77701 marked Normal to  
Clerk of Court. And Copy of  
Such mail Normal mail to all  
defendants Addresses in Civil  
Complaint. 

49230066 P.O. Box 26020

Beaumont, TX 77729

28 U.S.C. 1746; 18 USC 1001 et seq

CHARLES BROOKS

CHARLES ARRON  
BROOKS

P.O. 26020  
Beaumont, TX  
77720

C.A. Brooks  
49230066  
P.O. Box 26020  
Beaumont, TX  
77720

F.

8/15/2017

Exhibits

(9)

Copy

# SWORN VERIFICATION

UNDER 18 U.S.C. 1621 & 18 U.S.C. 1746  
From 12/29/16 - 8/15/17 BOP deny prisoner  
medical records to Attach with Complaint

Charles Aaron Brooks, declare  
he has Followed the BOP Policy,  
CFR to obtain Medical Records,  
Mental Records For the Court  
the prisoner Filed FOIA, Requests,  
Sick call slips, Spoke to Medical  
Dept, Mental Dept, written, Verbal  
Request will show prisoner Request  
went Non-Responded. There is  
Records of Orthopedic doctors, etc  
therapist, bone doctor etc that  
Verify that prisoner Need immediate  
Surgery on both Knees, back, injuries  
to Neck, upper & low back, Nerve damage  
scheduled for bunion removal surgery, disk  
back pain, deform feet. therapy would  
not help back, Neck, Knees pain, see  
X-Rays, MRI scans, Cat Scan. BOP officials  
U.S. Marshals Service denied Release of  
documents to Concealment of the truth from  
The U.S. District Court, Judges, Clerk, Pub-  
lic I declare the Foregoing is true & correct  
28 USC 1746, 18 USC 1621, 18 USC 1746  
599 Ch 16 8/15/17

Thanks For trying to help me

CHARLES Aaron Brooks  
49230-066  
R.S. Prison  
P.O. BOX 262030  
Beaumont, TX 77720

COPY sent to  
TO African Chapline  
Thank you

~~SWORN DECLARATION~~

18 USC 1621  
28 USC 1746  
18 USC 1004 et seq

Dear Chapline or Religious Chapline  
SWORN DECLARATION

Thanks For reporting these stalking and sexual assaults on approximately 1/22/17, 1/23/17, 1/29/17 they hit me in the head so much I black out cant remember actual dates, the Mental Department doctors, S.I.S officers, Complex Captain, captain, my entire unit team, medical staff Byrd, 12 guards claimed I deserve it to get your ass kicked Brooks you got a guard stab at Hazelton prison MR. Halzapfel, MR. S. Salem held a meeting and told us about it to all the staff, no one is going to help you. Brooks Brooks face is swollen, he cant walk barely standing his knees, back, neck is swelling, Face and eye swelling face bleeding, Brooks informed Chapline ANUS bleeding, Abdominal pains, Brooks may have DNA sperm sample of predators on underwear of repeat Rape. 20 staff refuse to report PREA, 18 USC 2243 on near 1/29/17 its for no one to trust but Religious Chapline

18 USC 1621, 28 USC 1746 1/29/2017

~~STAFF~~

Approximately 1/29/17 repeated down the 5 STAFF  
The inmates stay MR. Yeager  
and Owens the STAFF  
Chapline rape name that  
I wrote & talk to  
all STAFF Dr. K. Brown  
Deputy officers Refuse  
to report these crimes  
Hate crimes  
I was brutally  
beaten, Rape,  
Sexual Assault  
stalked do to  
my handicapp  
disabilities  
Race - Religion and  
Sexual Orientation  
by STAFF

~~STAFF~~

~~STAFF~~

CHARLES AARON BROOKS  
49230-066  
P.O. Box 26020  
Beaumont, TX

C C File

copy mail  
to warden

The prisons grievance  
were UNAVAILABLE to  
CHARLES AARON BROOKS NO  
COUNSELOR EMPLOYED ON BB-UNIT  
FOR 8 MONTHS PRIOR/BEYOND

SHORT Declaration of Prisoner/Victim  
Charles Aaron Brooks 49230066 prove  
he entitled to Access to the Court  
28 USC 1746, 18 USC 1621, 18 USC 1001 ET  
ESQ Ch AD 7/27/2017 prove he  
Live below poverty guideline, defendants  
Unit team Case Manager, Unit Manager,  
STHV Unit deprive prison 5 stamps a week,  
Refuse to mail out legal mail for free  
the prisoner denied Law Library, recreat-  
ion out side because he file grievance  
and Civil Actions Against defendants  
prison officials denied paper, envelopes  
Vanilla Envelops, Copies of legal material  
are denied, denied pens, Adequate pencils, legal  
Attorney calls, there is no Counselor for BB-  
Unit No STAFF to give inmates grievances  
Forms, its no Counselor to give up special  
Mail or legal mail or BP-10, BP-11 response in  
A timely Fashion. Deny prisoner the Right to  
Exhaustion of Administrative Remedies  
at Beaumont Prisons is UNAVAILABLE. Denied  
Access to the Court, denied legal help, Legal  
BOOKS, cant response to incident Reports Against  
prisoner Ch AD right violated  
18 USC 1621, 18 USC 1746 Ch AD 8/20/17

CHARLES AARON BROOKS 49230066 PRISONER should be transferred to (12)  
D.O. BOX 26020 Medical Facility: Copy mail to  
Beaverton, TX 77720 Each staff herein  
named below

SWORN AFFIDAVIT  
OF TRUTH 18 USC 1001 et seq,  
28 USC 1746 CHARLES AARON  
BROOKS / Charles A. Brooks 8/16/17

Copy

Ch informed all prison staff including  
duly states: on approximately January 2, 2017 to DR.  
POLAVARAPO, MR. BYRD, D. MAZE, MR. PAIMPALIL, S. SALEM,  
HOLZAPFEL, I'm unable to walk up so many stairs  
BB-unit. I fell 7 different times. (suffer pains in  
my knee's, back, neck, should, head, ankles, feet, knee's  
I need surgery KNEE replacement surgery. Forcing  
me to Clam up on top bunk bed in cell cell 420 on  
BB-unit I fell, there is no Rail bars, no handicap  
accessible Showers. DR. Polavaraapu promise me to  
move me on lower level unit. Its unsafe environ-  
ment force me to Clam so many stairs. Denied me  
Lower tier, lower bunk. My team BB-unit REFUSE  
to move me, defendants I have in grievances still  
will not process them. We have no Counselor on BB-unit  
denied programs Challenge, denied therapy, denied  
wheel chair, walking cane, Knee braces, Knee braces, back  
brace, extra Mattress, denied soft shoes (prisoner need  
union remove surgery) on feet, denied services (medical  
services), denied mental services of sexual abuse counsel-  
ing etc. Defendants interfered with Medical Orders pre-  
scribed by Orthopedic doctors to give plaintiff Knee replace-  
ment surgery in both knee's in the year December 2015  
on approximately. Defendants Failure to do. Plaintiff  
Fell on January 2, 2017, approximately December 28, 2016,  
January 4, 2017, January 20, 2017, January 19, 2017,  
January 21, 2017, 1/22/17, 1/23/17, the sock call slips  
to medical Dept bear the actual more days Plaintiff Fell  
in shower 7/8/17, 6/11/17, 7/10/17, 6/23/17, medical records  
show so many dates head injury cause Memory loss injuries  
to head 1/29/17, prisoner Fall so much his knee's, back give out  
he Fell From top bunk to floor bedridden July - 2017 - August 15, 2017  
approximately June 2017 its cruel & unusual punishment to deny surgery  
and to deprive him handicap disable Accessible jail, Plaintiff  
medical records & mental health records agree he meets the standard for  
ADA-essential elements Architectural Barriers Act, Rehabilitation Act.  
I Ch A Q 28 USC 1746, 18 USC 1001 et seq date 8/16/17



CHARLES A. BROOKS  
49230-066  
P.O. Box 26020  
Beaumont, TX  
[77720]

copy sent

CC File (13) COPY  
mailed to <sup>mailed</sup> to  
Medical Dept warden  
COPY.

For these reasons  
Bedridden yet Recreation  
officer denied  
prisoner recreation.

### SWORN AFFIDAVIT

I, Mr. A. B. did informed all  
defendants and non-defendant my unit  
team, medical staff I need knee replacement  
surgery and cant walk up so many flight of  
stairs to BB-unit cell 420. I fell off top  
bunk 4 time on 1/2/2017, 1/5/2017, 1/16/17  
and 1/21/17 the Female staff B. Como  
refuse to call in medical emergency do  
to lockdown. In December 2016 the Medical  
Doctor, Complex Captain, D. Maze defendants  
promise to transfer me to Medical Facility  
to have surgery on both knees. Promise to  
move me to lower tier unit, closer to din-  
ing hall to a handicapp disable Accessible  
cell. In a lower bunk bed pass order. The  
prisoner falls on dates above cause head injur-  
ies, neck, back, knee pain, feet, pains, denied a  
wheel chair, walking cane, denied knee brace, back  
brace, therapy, surgery, MRI scan, X-Ray, Adequate  
medication, cat scan for head damage, in SHU Unit  
prisoner fell in shower in non-handicapp Accessible  
cell 2/2/17, 2/4/17, 4/17/17 fell in cell 5/5/17  
6/6/17, 6/14/17, 7/8/17, 6/11/17, 7/10/17, 6/23/17  
8/1/17 7/12/17, 8/19/17 denied medical treatment  
28 USC 1746, 18 USC 1621  
8/15/2017

CHARLES BROOKS Copy  
49230-066  
P. O. BOX 26020  
Beaumont, TX

" 77720  
[PREA COMPLAINT]

Sworn Declaration (14)  
Ch An B 28 USC 1746, 18 USC  
1001 et seq 8/15/17

The Found the DNA

Evidence that identified  
these predators it was  
in my legal book, they  
saw my cell 36 on

8/8/2017 the medical from 1/29/17 -  
8/6/17 refuse to do  
medical examination  
Forensic on cloth  
bear sperm of  
guards.

TO: OFFICE OF THE INSPECTOR  
General  
Investigations Department  
P. O. BOX 4003

Huntsville, TX 77340

Dear BOP Director &

Dear Honorable Inspector General

" Sworn Declaration of Victim "

Prior informed your office in letter  
2/2/2017, 3/15/2017, 4/2/2017, 4/20/17  
5/23/17, 6/3/2017 and 8/4/2017 on

Approximately on this dates Above. I  
had DNA evidence on piece of cloth  
that were on my Underwears (sperm)

prima facie proof that Prison Staff males  
did repeatedly rape me in a sexual assault  
18 USC 2243, BOP Policy 5324.06, 5324.11,

[PREA] had prisoner been immediately

transfer it would not have happen. Inmate  
was handcuffed behind his back in Lieutenant  
Office in U.S. Penitentiary on Approximate-  
ly 1/29/2017. Battery, Rape by 5 John Does  
Prison Officials. Hate Crimes Continues.

On Approximately 1/23/2017 One prison  
Official came in cell sexually assaulted, bat-  
tery prisoner African American male.

On approximately 1/22/2017 4 prison guards  
Battery, sexually assaulted prisoner  
because he is sexual orientation, race -  
religion and handicapp disabled. It  
violate 5th, 8th, 14th amend Right &  
state Hate Crime law. BOP refuse to  
force guards to undergo lie detector tests.  
The guards destroyed DNA evidence I had  
stored in a plastic bag of there DNA, sperm sample  
on 8/15/2017 retaliation 28 USC 1746 Ch An B 8/15/17

Copy given to Staff

8/15

CHARLES AARON BROOKS  
49230-066 P.O. BOX 26020  
BEAUMONT, TX 77720

Original

FREEDOM OF INFORMATION REQUEST

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

AUG 25 2017

TO: U.S. DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION  
300 WILLOW STREET, SUITE 104  
BEAUMONT, TX 77701

BY  
DEPUTY \_\_\_\_\_

Civil NO.  
Re: 1:17CV351

Dear Deputy Clerk

Pursuant to (FOIA) or 5 U.S.C. 552, plaintiff request a stamp File Copy of ~~the~~ the New Civil Complaint ~~inside~~ and attached exhibits. Plaintiff is indigent without a copy for himself. He ~~live~~ below the poverty guideline, and pray he can get a copy of Civil NO. 1:17CV351 that inside envelop. Thank you sincerely so plaintiff can have copies for his files.

CHARLES AARON BROOKS  
#49230-066

P.O. BOX 26020  
Beaumont, TX

I Ch AB declare that  
its plaintiff that Make this  
Request 18 USC 1001 et seq, 28 USC 1746  
Ch AB 8/20/17